

FILED

August 25, 2021

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
DEL RIO DIVISION

BY: SA
DEPUTY

UNITED STATES OF AMERICA

§

CAUSE NO.: **DR-21-CR-01343-AM**

§

§

INDICTMENT

v.

§

§

[VIO: COUNT ONE: 8 U.S.C. §

§

1324(a)(1)(A)(v)(I) & (B)(i) Conspiracy

TOMAS ALEJANDRO MENDEZ

§

to Harbor Illegal Aliens.]

PAOLA NIKOLE CAZARES

§

§

THE GRAND JURY CHARGES:

COUNT ONE

[8 U.S.C. § 1324(a)(1)(A)(v)(I) & (B)(i)]

Between on or about September 2020 and August 25, 2021, in the Western District of Texas, Defendants,

TOMAS ALEJANDRO MENDEZ,
PAOLA NIKOLE CAZARES,

did knowingly and intentionally combine, conspire, confederate and agree with others known and unknown, to commit the following offense against the United States: knowingly and in reckless disregard of the fact that certain aliens had come to, entered and remained in the United States in violation of law, did conceal, harbor and shield from detection and attempted to conceal, harbor, and shield from detection such aliens in Eagle Pass, Texas, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(v)(I) & (B)(i).

A TRUE BILL

FOREPERSON

ASHLEY C. HOFF

United States Attorney

By:  FOR

STEPHEN KAM

Assistant United States Attorney